

MEMORANDUM

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DOC#:

DATE FILED: 7/20/21

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July 19, 2021

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

We write the Court requesting a modification of Mr. Jacobs's pretrial release conditions; specifically, a modification of Mr. Jacobs's travel restrictions to permit travel within the continental United States. As the Court may know from prior applications, Mr. Jacobs has a business installing and servicing credit card processing machines. He would like to continue to travel to service his expanding business and potentially to secure new clients. He has applied for several prior travel modifications, each expanding his range of locations he may go, and the Court graciously granted each of those requests. Mr. Jacobs, in turn, has returned within the allotted time from each trip, and has scrupulously abided by all of his bail conditions. These trips have been extremely beneficial to Mr. Jacobs's credit card processing business.

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Mr. Jacobs has offered to, and will, inform Pretrial Services and the Government whenever he is planning to take a trip outside of the Southern and Eastern Districts of New York. We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (Officer Viosanny Harrison). The Government and Pretrial Services both take no position. Thank you for your consideration.

Respectfully submitted,

s/

Marc Agnifilo

Zach Intrater

cc: AUSAs Samuel Raymond & David Felton (via email)
Pretrial Services Officer Viosanny Harrison (via email)

The application is **GRANTED**.
So Ordered.



7/20/21